



# IN THE HIGH COURT OF JUSTICE

ANTIGUA AND BARBUDA

Claim No: ANUHCV2025/0149

**BETWEEN**

**ANTIGUA & BARBUDA**

(Claimant, by and through the Attorney General, with Sheriff-at-Large Alkiviades David)

– and –

**THE MEDIA CARTEL**

(Defendants: David Boies, Shari Redstone, Gloria Allred, Anthony Pellicano, Tom Girardi, Michael Avenatti, Gary Dordick, CBS Interactive, Antigua Observer, et al.)

Submitted Date: 15/09/2025 10:35

Filed Date: 15/09/2025 10:35

Fees Paid: 22.00

---

## ADDENDUM COMPLAINT AGAINST ANTIGUA OBSERVER

**To:** The Registrar, High Court of Justice – Antigua & Barbuda

The Claimant respectfully files this Addendum Complaint in the above-captioned matter, placing on record further particulars of defamation and sovereignty interference by the *Antigua Observer* newspaper.

---

### 1. Publication at Issue

On or about September 2025, the *Antigua Observer* published an article entitled: **“U.S. Court clears path for corruption probe into PM Browne’s finances to proceed.”**

This article falsely and misleadingly suggested that the Prime Minister of Antigua & Barbuda remains subject to an active corruption probe in the United States.

---

### 2. Material Omission of Binding U.S. Court Decision

The *Observer* failed to report that on **9 June 2025**, the United States District Court for the Southern District of New York (Hon. Jesse M. Furman, J.) dismissed all subpoenas, vacated its

prior order, and ordered the destruction of all materials obtained, holding that the applicant “failed to meet the statutory requirements for relief” under 28 U.S.C. § 1782.

---

### 3. Connection to Media Cartel

The false framing by the *Observer* mirrors a broader mainstream media narrative orchestrated by:

- Shari Redstone’s Paramount / CBS Interactive
- Comcast (NBCUniversal / DoubleVerify)
- Fox Corporation
- Disney (ABC)
- Daily Mail Group

together with their legal allies David Boies, Gloria Allred, Anthony Pellicano, Tom Girardi, Michael Avenatti, and Gary Dordick.

This coordinated strategy of **lawfare and misreporting** constitutes a deliberate assault on Antigua’s sovereignty.

---

### 4. Defamation and Sovereignty Breach

By omitting the binding U.S. Federal Court ruling, the *Antigua Observer*:

- committed **defamation by omission** against Antigua’s Prime Minister and Government;
  - undermined public trust in Antigua’s institutions; and
  - aided the Media Cartel’s broader attempt to erode the sovereignty and international standing of Antigua & Barbuda.
- 

### 5. Relief Sought

The Claimant respectfully requests:

1. A declaration that the *Antigua Observer* is liable in defamation and complicit in the Media Cartel’s sovereignty attack.
2. An order requiring the *Observer* to issue an immediate correction and apology, prominently in print and online, acknowledging the U.S. Federal Court ruling of 9 June 2025.
3. Damages for reputational harm caused to the Government and people of Antigua & Barbuda.

4. Costs of this addendum complaint.
5. Such further or other relief as this Honourable Court deems just.

---

## **STATEMENT OF TRUTH**

I believe that the facts stated in this Addendum Complaint are true.

Dated this 14th day of September 2025

**Electronically Signed:**

/s/ Alkiviades David

Sheriff-at-Large

On behalf of Antigua & Barbuda

---